



August 13, 2021

Submitted via electronic mail

Patrick Oshie, Chair, Power Committee
Northwest Power & Conservation Council
851 SW 6th Avenue, Suite 1100
Portland, OR 97204

Dear Chairman Oshie:

Public Generating Pool (PGP) is writing to follow-up on our previous letter citing concerns with the new Northwest Resource Adequacy Assessment results. PGP thanks the Council for responding to our previous letter and making staff available to answer our questions. While we believe we are building a deeper understanding of the analytical work, we continue to request that the Council not include an adequacy assessment conclusion based on the new GENESYS modeling.

Based on our engagement in your public meetings and direct conversation with staff, PGP believes Council staff is building an ambitious modeling tool that could provide interesting insights as the regional system continues to evolve and change. We also appreciate the themes being identified about the resource changes in other parts of the West and the impact it may have in the Northwest. However, PGP believes, at this time, the modeling of those changes is not sufficiently robust to develop or cite a specific adequacy assessment conclusion in the upcoming Power Plan.

The key areas of concern with the modeling that we have identified include:

- Lack of modeled variability in weather, load and resource conditions in areas from where imports are assumed
- Assumption of imports from outside the Northwest during non-solar hours
- Hourly modeled hydro output at many of the hydro projects that is significantly outside historic and acceptable ranges of variability
- Use of a limited set of water years and limited variability in runoff
- The number of games run (180) is not sufficient to capture the full range of potential outcomes of resource and load variability

The West has seen historic weather and wildfire events that have impacted demand and limited access to generation in ways never seen and certainly not modeled in planning. From PGP's perspective, adequacy planning is becoming more complex and it is the wrong time to simplify assumptions or rely on limited data sets.

At the Resource Adequacy Advisory Committee meeting, Council staff indicated that the classic GENESYS estimates a 22% loss of load probability, and the new GENESYS estimates a 0% loss of load probability. Council staff attributes approximately 15% of the change to a change in import assumptions. Several entities in the West have recently had to declare Energy Emergency Alerts or implement rolling blackouts because they assumed imports that did not materialize. Because of the new uncertainties on

the system and the recent challenges utilities have had with imports, PGP recommends the Council be very cautious about publishing such a significant shift in adequacy outcomes based on a change in assumptions of imports.

PGP appreciates the willingness and openness of Council staff to discuss their analysis and the evaluation of the impact of significant build-out in other parts of the west may have on the Northwest. The model that is being built can be an important tool to explore these effects. However, at this time, PGP does not feel the tool has sufficient granularity or vetting to draw conclusions about the adequacy of the Northwest system. For these reasons, we ask that you not to include any adequacy assessment conclusion in the Power Plan.

Sincerely,

A handwritten signature in cursive script, appearing to read "Therese Hampton".

Therese Hampton, Executive Director
Public Generating Pool

Cc: NWPCC Members
Bill Edmonds, NWPCC Executive Director
Ben Kujala, NWPCC Director of Power Planning
PGP Executive Committee